

1 **LEGAL AID SOCIETY OF SAN DIEGO, INC.**

2 MIKA WILBUR (Bar No. 289017)

3 FANNY CHERNG (Bar No. 27046)

4 **Legal Aid Society of San Diego, Inc.**

5 110 South Euclid Avenue

6 San Diego, California 92114

7 Tel.: 619-471-2793

8 Fax: 619-263-5697

9 mikaw@lassd.org

10 fannyc@lassd.org

11 Alara T. Chilton (SBN 236711)

12 **Law Office of Alara T. Chilton**

13 185 West "F" St. Suite 100

14 San Diego, CA 92101

15 Tel: (619) 672-7201

16 Email:alarachilton@gmail.com

17 **Attorneys for Creditors**

18 Martha and Javier Cordova

19 **UNITED STATES BANKRUPTCY COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

21 In re:

22 Bankruptcy Case No. 2:24-bk-10997-SK

23 Jetsee Salathiel Martinez Esquivel,

24 Chapter 13

25 Debtor.

26 **JOINT STIPULATION TO EXTEND  
DEADLINE TO FILE ADVERSARY  
PROCEEDING COMPLAINT FOR  
CREDITORS MARTHA AND JAVIER  
CORDOVA**

27 IT IS HEREBY STIPULATED AND AGREED by and between Martha Cordova and  
28 Javier Cordova (Creditors) and Debtor Jetsee Salathiel Martinez Esquivel (debtor), through their  
respective counsel of record, as follows:

1 **RECITALS**

2 A. Creditors filed a state court action against Debtor on January 7, 2021, alleging  
3 violations of various consumer protection statutes against Debtor and others.

4 B. Debtor filed a Chapter 13 bankruptcy petition on February 9, 2024, which did not  
5 identify Creditors on the petition.

6 C. Debtor filed an amended petition on March 19, 2024, which also did not identify  
7 Creditors on the petition.

8 D. Creditors were first notified of Debtor's bankruptcy filing on March 21, 2024,  
9 when Debtor's counsel in the state court action emailed a notice of stay due to this bankruptcy  
10 filing.

11 E. On April 18, 2024, Creditor filed a summary of Amended Schedules, on which the  
12 Creditors were now included.

13 F. Creditors submitted a proof of claim on April 19, 2024. Creditors received an  
14 electronic verification stating the claim was successfully filed in case number 24-10997, claim  
15 number 11.

16 G. Given the delay in receiving notice of the bankruptcy filing, creditors requested  
17 additional time to prepare the Adversary Complaint. Creditors reached out to Debtor's counsel,  
18 Hector Vega, and he was agreeable to the extension.

19 **AGREEMENT**

20 Subject to the approval of the Bankruptcy Court, the deadline for Creditors to file their  
21 adversary proceeding complaint is extended to and including June 21, 2024.

22 IT IS SO STIPULATED.

23 Date: May 7, 2024

24 Respectfully submitted,  
25 **LEGAL AID SOCIETY OF SAN DIEGO**

26 By Fanny Cherng  
27 FANNY CHERNG  
MIKA WILBUR  
ALARIA CHILTON  
28 Attorneys for Creditors

1 Date: May 6, 2024  
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3 Respectfully submitted,  
4 LAW OFFICES OF HECTOR VEGA  
5

6 By   
7 HECTOR VEGA  
8 Attorney for Debtor  
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